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IN THE UNITED STATES DISTRICT COURT
6
FOR THE DISTRICT OF ARIZONA
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8 IN RE: Bard IVC Filter Products
9 Liability Litigation

Case No. MDL 15-02641-PHX-DGC

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11 **QUALIFIED PROTECTIVE ORDER (REDACTED)**
12

13 The individuals listed on attached Exhibit A have asserted claims against defendants in the
14 above captioned action. These individuals have retained McSweeney/Langevin, LLC
15 (“Counsel”) to represent them in relation to the above-captioned action. Counsel agrees that they
16 represent the individuals identified in Exhibit A.
17

18 **IT IS HEREBY ORDERED:**
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20 1. By virtue of their status as Counsel for the individuals listed on Exhibit A, Counsel shall
21 resolve any potential Part A and/or Part B fee-for-service Medicare Secondary Payer
22 (MSP) claim(s) related to settlements, judgments, awards, or other payments associated
23 with the above captioned action for those individuals on Exhibit A who are or were
24 Medicare beneficiaries.
25

26 2. Counsel has also retained ARCHER Systems, LLC (“ARCHER”) to identify and resolve
27 potential healthcare liens with Medicaid agencies, TRICARE, Veteran’s Administration,
28 Department of Defense, Indian Health Services, and private health insurers, (hereinafter,

1 collectively “the Agencies”) claim(s) related to settlements, judgments, awards, or other
2 payments associated with the above captioned action for those individuals on Exhibit A
3 who are or were beneficiaries of the Agencies.

4 3. The entry of this HIPAA-compliant qualified protective order is necessary in this action
5 in order to permit the Agencies to transmit lists of information, including protected health
6 information and other related information regarding the individuals listed on Exhibit A
7 to ARCHER, rather than providing copies of individual HIPAA authorizations and
8 information on a claimant-by-claimant basis, including any third party authorized by
9 ARCHER or the Court to assist in the resolution of the Agencies’ potential liens and
10 reimbursement claims.

11 4. As such, it is hereby ordered:

12 a. This Qualified Protective Order shall apply to all “protected health information”
13 and “individually identifiable health information,” as defined by 45 CFR § 160.103,
14 or information that is otherwise protected from disclosure by the Privacy Act, 5
15 U.S.C. § 551a, the Health Insurance Portability and Accountability Act of 1996,
16 Pub. L. 104-191, 42 CFR § 431 Subpart F, titled “Safeguarding Information on
17 Applicants and Recipients” and other applicable state law, created, received or
18 collected from plaintiffs and claimants by the Agencies, including, but not limited
19 to: (a) names and addresses, dates of birth, social security numbers, identification
20 numbers and other demographic information that identifies, or could be used to
21 identify the individuals listed on Exhibit A; (b) eligibility and entitlement
22 information for the individuals listed on Exhibit A; (c) claims information relating
23 to the past, present, or future health care of the individuals listed on Exhibit A; (d)

1 claims information relating to the provision of healthcare to the individuals listed
2 on Exhibit A; and, (e) claims information relating to the past, present, or future
3 payment for the provision of healthcare to the individuals listed on Exhibit A.

4 b. Each Agency is hereby authorized and directed to transmit to ARCHER to assist in
5 the resolution of potential liens or reimbursement claims, any information,
6 including claims information and other protected health information, for those
7 individuals listed on Exhibit A against whom they may assert liens or
8 reimbursement claims.

9 c. ARCHER shall not use or disclose any protected health information or individually
10 identifiable health information subject to this Qualified Protective Order for any
11 purpose other than this litigation, including compliance with any applicable Court
12 orders or other legal obligations. Similarly, the Agencies shall only use the
13 information listed on Exhibit A for the specific purposes of transmitting to
14 ARCHER any information, including claims information and other protected health
15 information, for those individuals listed on Exhibit A in the above-captioned matter
16 against whom the Agencies have asserted liens or reimbursement claims, or in
17 whose potential settlements the Agencies may have an interest. The Agencies shall
18 only make the information for the individuals listed on Exhibit A available to those
19 within their respective Agency who need access to the information for the
20 individuals listed on Exhibit A for the specific purpose stated in this paragraph. If
21 the Agency utilizes outside vendors or companies to perform part or all of their tort
22 recovery practices, the outside vendors or companies shall be expressly bound by
23 all terms and conditions of this Qualified Protective Order.

1 d. ARCHER shall maintain any protected health information or individually
2 identifiable health information subject to this Qualified Protective Order in a secure
3 and safe area and shall exercise the same standard of due and proper care with
4 respect to the storage, custody, use and/or dissemination of such protected health
5 information as is exercised by ARCHER with respect to its own confidential
6 proprietary information.

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8 Dated this 7th day of March, 2022.
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13 David G. Campbell
14 Senior United States District Judge
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EXHIBIT A

	Last Name	First Name	DOB		Last Name	First Name	DOB
1	Alaway	Loretta	1957		Lair	Steve	/1951
2	Alcorn	Vyrl	/1945		Lamb	Rosemond	/1945
3	Alfonso	William	/1982		Lamore	Donald	/1945
4	Alford	Tammy	/1967		Lange	Rhonda	/1973
5	Allen Morgan	Darline	/1955		Lantz	Dawn	/1961
6	Alvarez	Roman	/1971		Lawson	John	/1964
7	Alvarez	Carmen	/1944		Leamon	Zachary	/1986
8	Ames	Kevin	/1964		Leavelle	Steve	/1965
9	Anderson	Ronald	/1968		Lee	Davey	/1973
10	Andrews	Raymond	/1938		Leighton	Juanita	/1954
11	Andrews	Debra	/1960		Lewis	Lloyd	/1956
12	Arasteh	Bibi	/1957		Lewis	Cynthia	/1954
13	Arasteh	Bibi	/1957		Logan	Alfreda	/1976
14	Armstrong	Karlie	/1993		Logan	Alfreda	/1976
15	Arnold	Patrick	/1949		Long	Theresa	/1962
16	Arrington	Mose	/1954		Long	Theresa	/1962
17	Atkinson	Gary	/1952		Lopez	Jenny	/1982
18	Atkinson	Gary	/1952		Lorey	Virginia	/1954
19	Baez	Sally	/1990		Lozinak	George	/1941
20	Bagley	Emily	/1934		Mackey	Brinder	/1958
21	Baham	Sarah	/1956		Magee	Angela	/1970
22	Baker	Carol	/1956		Mahlman	Rex	/1964
23	Baker	Carol	/1956		Marano	Kristin	/1984
24	Ballard	Donnell	/1967		Markley	James	/1935
25	Balogh	Melody	/1966		Marmolejo	Aurelio	/1980
26	Barbot Jr.	Edgar	/1958		Marok	James	/1970
27	Barrick	Terry	/1948		Marshall	Carl	/1976
28	Bartlett	Adele	/1946		Marshall	John	/1969
	Bartlow	Lisa	/1975		Martin	Anita	/1960
	Bass	James	/1951		Martin	Wanda	/1941
	Belloise	Linda	/1955		Martin	Wanda	/1941
	Belloise	Linda	/1955		Martin	Lori	/1957
	Benedict	Destinee	/1994		Martinez	Michael	/1969
	Berry-Boles	Margaret	/1963		Martinez	Michael	/1969
	Berstler	Lisa	/1966		Martinez	Maria	/1955
	Blakeney	Ricky	/1957		Martinez	Maria	/1955
	Bowers	Robby	/1978		Masiello	John	/1948
	Brauer	Deon	/1979		Mason	Christopher	/1968
	Brauer	Deon	/1979		Mason	Gregory	/1975
	Brewer	Denise	/1951		Mata	Dennis	/1965

1	Brickley	Kyana	/1970		Mathews	Kimberly	/1960
2	Brickley	Kyana	/1970		McCabe	Eleanor	/1929
3	Brossett	Sharon	/1967		McCollum	Melissa	/1968
4	Broussard	Shane	/1971		McCrory	Jennifer	/1983
5	Brown	Kendrick	/1978		McElroy	Cindy	/1967
6	Brown	Lorraine	/1966		McKeefry	Travis	/1982
7	Brown	Lorraine	/1966		McMillian	James	/1969
8	Buccini	Elizabeth	/1944		McMillian	Darlene	/1963
9	Buccini	Elizabeth	/1944		Melinski	Cathy	/1964
10	Buchan	Jerry	/1987		Mello	Elizabeth	/1987
11	Bull	Richard	/1952		Mello	Elizabeth	/1987
12	Burkert	Betty	/1935		Merritt	Roger	/1951
13	Burney	Timothy	/1980		Miller	Yvonne	/1948
14	Burrell	Felecia	/1966		Miller	Brent	/1967
15	Butler	Jonathan	/1979		Miller	Vickie	/1951
16	Butler Sr.	Michael	/1961		Mitchell	Will	/1977
17	Calloway	Sherrill	/1977		Moore	Tracy	/1963
18	Caputo	Joseph	/1955		Morgan	Sharleatha	/1958
19	Carnegie	Averil	/1958		Morgan	Robin	/1966
20	Cates	Charles	/1956		Morgan	Mona	/1937
21	Chambers	Fredrick	/1964		Morris	Monda	/1952
22	Chatfield	Marcia	/1963		Mota-Medina	Isa	/1992
23	Cheek	Deana	/1964		Muhammad	Khalilah	/1964
24	Cianferano	Tammy	/1962		Mullins	Nicholas	/1986
25	Clark	Kathleen	/1947		Mullins	Nicholas	/1986
26	Clark	Patti	/1953		Mustoe	Robert	/1960
27	Clelland	Joyce	/1942		Navarrete	Ana	/1969
28	Clelland	Joyce	/1942		Neely IV	William	/1975
	Conrad	Lisa	/1963		Neely IV	William	/1975
	Conrad	Lisa	/1963		Newton	Aaron	/1975
	Cook	Laura	/1964		Nunn	Berthena	/1955
	Cook	China	/1994		Oakes	Jeremy	/1981
	Cooper	Harold	/1954		Orso	Randy	/1974
	Cooper	Ricky	/1958		Orso	Randy	/1974
	Cotter	Vernon	/1955		Ortiz	Jimmie	/1956
	Craft	Bennie	/1941		Ott	Eve	/1936
	Crosby	Beverly	/1957		Paige	Glenn	/1948
	Crutchfield	Linda	/1960		Parker	Katherine	/1957
	Crutchfield	Linda	/1960		Parr	Michael	/1981
	Custer	George	/1956		Parrish, Jr.	Roy	/1955
	Davis	Terry	/1961		Patchman	Jerry	/1941
	Davis	Marian	/1959		Pennington	Coty	/1990
	Dean	Herbert	/1948		Pennington	Vickie	/1962

1	Dedon	John		/1947	Perez	Robert		/1953
2	DeJesus	Martin		/1964	Petersen	Elizabeth		/1981
3	DeMasi	Sandra		/1936	Phariss	Charles		/1954
4	DeMille	Carolena		/1943	Philmore	David		/1971
5	Denison	Timothy		/1963	Powell	Clifton		/1962
6	Dennis	Walter		/1956	Price	George		/1956
7	Difulvio	Kathleen		/1955	Pryor	Kyle		/1977
8	Dilgard	Jennifer		/1968	Ray	Laura		/1935
9	Doszpoly	Jane		/1955	Reazer-Kremitzki	Vicki		/1954
10	Draper	Christopher		/1968	Reeves	Johnny		/1944
11	Drazdys	Andrius		/1967	Reid	Carla		/1964
12	Drolet	Vicky		/1969	Rimmer	Matthew		/1985
13	Duncan	Betty		/1931	Rinaldo	John		/1954
14	Dunnaway	Terrence		/1976	Risner	Sonya		/1966
15	Durden	Dorothy		1982	Robbins	Ingrid		/1947
16	Eaker	Thomas		1951	Robinson	Mercedes		/1993
17	Edelbeck	Irene		/1982	Rogers	Azile		/1942
18	Ehli	Rodney		/1964	Roody	Mary		/1954
19	Ellet	John		/1963	Roos	Kathy		/1959
20	England Harp	Martha		/1966	Rose	Debra		/1960
21	England Harp	Martha		/1966	Ruiz	Juan		/1960
22	Evans	Teresa		/1959	Ruth	Melinda		/1971
23	Evans	Clifton		/1981	Sadler	Carol		/1939
24	Evans	Rickey		/1953	Salter	James		/1959
25	Fennell	William		/1943	Salter	James		/1959
26	Ferguson	Michael		/1955	Sanchez	Joseph		/1946
27	Ferguson	Todd		/1970	Schilling	Sherry		/1955
28	Figard	Stephen		/1971	Schilling	Sherry		/1955
	Finch	Sheila		/1961	Schoultz	Mattie		/1939
	Fiore	Frederick		/1937	Seidler	Ian		/1942
	Fitzgerald-Johnson	Loretta		/1967	Seidler	Ian		/1942
	Ford	Francis		/1969	Sessoms	Ethel		/1960
	Ford	William		/1957	Sessoms	Ethel		/1960
	Fries	Glenn		/1958	Shannon	Theresa		/1954
	Frost	Cheryl		/1959	Shedd	Kelly		/1973
	Frost	Cheryl		/1959	Shervino	Thomas		/1947
	Fuller	Frank		/1940	Shirey	Charles		/1955
	Gain	Mark		/1958	Shults	Cynthia		/1952
	Gardner	Ann Marie		/1969	Siefker	Arnold		/1936
	Gerkin	Chad		/1979	Simpkins	Sabrina		/1980
	Gillespie	Jennifer		/1982	Sims	Teddy		/1951

1	Gillum	Frank		/1949		Small	Emily		/1966
2	Ginnett	Gwendolyn		/1951		Smith	Raymond		/1961
3	Giordano	Michael		/1952		Smith	Sherry		/1972
4	Gissen	Lynn		/1959		Smith	Kevin		/1936
5	Glasgow	Brian		/1977		Smith	Larry		/1965
6	Gomes	Alice		/1993		Snyder	Randy		/1950
7	Goodall Jr.	David		/1966		Snyder	William		/1955
8	Goodman	Korondia		/1973		Sottler	Brenda		/1957
9	Goodwin	Douglas		/1942		Stagmaier	Kurt		/1951
10	Greathouse	Samantha		/1977		Stagmaier	Kurt		/1951
11	Gregg	George		/1937		Stanko	Lori		/1960
12	Gross	Jacky		/1976		Stanley	Barbara		/1945
13	Gross	Jacky		/1976		Starnes	Christopher		/1976
14	Guillard	Ella		/1932		Stephens	Barbara		/1942
15	Guinn	Catherine		/1962		Stevenson	Corrine		/1956
16	Gunter	Gregory		/1965		Stillwell	Billy		/1948
17	Hale	Joel		/1967		Stratton	Brenda		/1968
18	Hall	Gailyn		/1961		Strickland	Denise		/1951
19	Hall	Robert		/1954		Strickland	Denise		/1951
20	Haney	Terry		/1963		Sundmacher	Wayne		/1953
21	Harmon	Atlean		/1938		Swint	Denise		/1967
22	Harmon	Tammy		/1984		Swope	William		/1951
23	Harmon	Jacqueline		/1954		Tabron	Lisa		/1967
24	Harrelson	Jennifer		/1956		Taylor	Patsy		/1966
25	Haskins	Rodney		/1957		Taylor	Roy		/1966
26	Hawkey	Barry		/1959		Taylor	Wanda		/1966
27	Hawkins	Martha		/1946		Thacker	Sharon		/1966
28	Hercules	Jamie		/1974		Thigpen	Charles		/1948
	Hicks	Christy		/1981		Thompson	Sandra		/1952
	Hollender	Nancy		/1953		Tingling	Lanette		/1975
	Hostetler	Gary		/1944		Towery	Rebecca		/1954
	Houck	Christopher		/1971		Trabal	Jacqueline		/1969
	Houck	Christopher		/1971		Trailer	Jerome		/1959
	Hunt	Jeanne		/1948		Trudeau	Penelope		/1949
	Hutchins	Russell		/1966		Urbin	Clarence		/1941
	Ickes	Christopher		/1957		Urbin	Clarence		/1941
	Inman	Mary		/1950		Varela			
	Jankowski	Alexander		/1991		Linares	Salvador		/1961
	Janosov	Joseph		/1961		Varela	Salvador		/1961
	Jends	Sandra		/1964		Linares			
	Jimmerson	Thomas		/1942		Wade	Naurice		/1991

1	Johnson	Delorise	/1949		Walk	Daniel	/1951
2	Johnson	Michael	/1973		Walker	Bobby	/1961
3	Johnston	Phillip	/1958		Walker	Patricia	/1957
4	Jones	William	/1935		Wall-Valadez	Denise	/1952
5	Jones	Lisa	/1969		Waring	Christopher	/1984
6	Jones	Christopher	/1978		Watkins	James	/1944
7	Jones	Christopher	/1978		Watkins III	David	/1963
8	Jones	Mary Kay	/1951		Watson	Jennifer	/1962
9	Jones	Marshell	/1963		Welch	Frances	/1940
10	Jordan	Trudi	/1952		Whitecotton	Michael	/1942
11	Jordan	Daquita	/1984		Wiedenbeck	Jody	/1967
12	Jorgensen	Jeffrey	/1961		Wiles	Angelique	/1975
13	Kansier	Gregory	/1956		Williams	Ella	/1954
14	Keith	Neil	/1961		Williams	Robin	/1967
15	Kellam	Lazaundra	/1979		Williams	Edward	/1962
16	Kendrick	Lynda	/1943		Williams	Edward	/1962
17	Kimmons	Sheila	/1949		Williams	Barbara	/1964
18	King	Rogers	/1970		Williams	Charles	/1952
19	King	William	/1945		Williams	Wendell	/1973
20	Konrad	Lawrence	/1942		Wolcyk	Robert	/1967
21	Koumado	Komlavi	/1977		Woy	William	/1964
22	Kritchken	Donna	/1956		Wright	Donald	/1956
23	Kudelin	MaryJane	/1961		Yiengst	Linda	/1946
24	Kurzer	Raymond	/1956		Zagorski	Christopher	/1960
25	Kwiatkowski	Coleene	/1957		Zelenak	Kenneth	/1959
26	Kwiatkowski	Coleene	/1957		Zorn	William	/1941
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28							